Proceeding: IN THE MATTER OF TELECOMMUNICATIONS RELAY SERVICES AND SPE Record 1 of 1

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The American Speech-Language-Hearing Association (ASHA) ispleased =
to have the
opportunity to respond to the proposed regulations for Telecommunicatons =
Relay Services and
Speech-to-Speech Services for Individuals with Hearing and Speech =
Disabilities. ASHA is the
national professional and scientific association that represents nearly =
93,000 audiologists, speech-language pathologists, and speech, language, =
and hearing scientists, who research the acoustic,
physiological, and linguistic aspects of communication and provide =
habilitation and rehabilitation
services to children and adults with speech. I nguage, and/or hearing =
disabilities. As part of these
services, our professionals increase communication skills in a broad range =
of everyday life
activities, including telephone use. =20

ASHA has a long history of involvement in federal initiatives that promote =
communication access
for people with disabilities. ASHA participate,? in the Hearing Aid =
Compatibility (HAC) Act
negotiated rulemaking process, attended the 1996 Wireless Telephone =
Summit, was a member of
the subsequent hearing aid compatibility working group, and served as a =
member of the
Telephone Access Advisory Committee (TACC) of -he Architectural and =
Transportation
Advisory Board (the Access Board). Through a grant from the Department of =
Justice, ASHA also
developed communication-specific accessibility guidance for the Americans =
with Disabilities Act.=20

Telecommunications are an essential component of how we work, do business, =
socialize , take
care of basic needs, and, in general, live safely and independently. =
Telecommunications are
especially critical for people with disabilities since they are a means of =
preventing, reducing, and
even eliminating the social and physical isolation for which people with =
disabilities are highly at
risk.

ASHA's specific comments to the proposed rule are attached. Thank you for =
considering our
recommendations as you prepare the final regulation. If you need additional=
 information, please
feel free to contact Charles Diggs, Ph.D., (301) 897-0151, at our National =
Office. If you prefer,
his electronic mail address is CDiggs@asha.org.

Sincerely,
Nancy B. Swigert
President =20
Response of the American Speech-Language-Hearing Association Re:=20
CC Docket No. 98-67; FCC 98-90
Telecommunication Relay Services and Speech-to-Speech Services
July 20, 1998

The American Speech-Language-Hearing Association (ASHA) supports the FCC's decision to require all common carriers to provide speech-to-speech (STS) relay services for callers with speech and language disabilities throughout their service areas. ASHA agrees that Congressional intent in passing Title IV of the Americans with Disabilities Act was to make wire or radio communication services accessible to all people with disabilities so that communication could occur between such people and people without disabilities. ASHA, however, wishes to comment on certain aspects of the proposed rulemaking as detailed below.

Definition of Communication Assistant (CA)

The FCC's proposal to amend the definition of Communication Assistant (CA) by deletion of "from text to voice and from voice to text:" imp-lies that all CA's will have the necessary training and skills to handle STS calls effectively. To provide STS services, the CA must be able to:

o listen to a wider range of sound productions than that typically associated with a class of sounds (phonemes) and still identify those productions as part of the phoneme class;

o interpret sound substitutions, omissions, and distortions that may be idiosyncratic to the caller;

o identify sounds at a rate of speech that may be faster or slower than rates within normal limits, or identify utterances that may be produced at irregular rhythms, with inappropriate pauses, and with repetitions and prolongations;

o understand sentences that may be telegraphic or ungrammatical, contain incorrect words, and/or unrelated to the topic of conversation;

o understand the message even though voice quality may be harsh, nasal, breathy, soft, or a combination of these attributes;

o provide this service to a broad range of callers with speech and language disabilities that may (1) include multiples of the above symptoms; (2) include individual inconsistencies even within the same call; and, (3) be superimposed on regional dialectical patterns or patterns that are characteristic of other languages.

All of this must be done without the benefit of the visual cues and the full set of acoustic information that is present in face-to-face oral communication and for a

population whose speech
intelligibility ranges from mild to profound impairment. In cases where =
the signal is transferred
multiple times to reach an available CA, acoustic degradation may occur =
and reduce the cues=20

needed for understanding the communication

CA's providing STS services must learn what many compromised =
communication patterns
are, how they can vary from individual to individual, and listen to many =
hours of such
communication to increase their familiarity with these types of communicati=
on. Even so, many
messages will not be understandable without reflecting back to the caller =
what was understood
and asking questions to fill in what was not understood. These skills are =
completely different
from those required in communicating via TTY where users employ a protocol =
and code that is
fairly consistent from user to user.

ASHA also has concern about the application of transliteration to the =
CA for STS. Such a
concept requires verbatim transfer of the communication message. As a =
result, a person with
language problems due to stroke who says, "Pizza, pepperoni, two," would =
have the exact words
communicated rather than the more complete message "I'd like two pepperoni =
pizzas." Or,
another person with word finding problems who says, "Pizza, pepper, two," =
would have these
words communicated without any questioning by -he CA to confirm with the =
caller the real intent
of the message.

RECOMMENDATION

Therefore, ASHA recommends that the FCC retain the current definition =
of CA and add a
the new definition below:

Communication assistant: Speech-to-Speech (CA-STS) : A person who provides =
more intelligible
voice communication between one end user of TRS and another end user while =
maintaining the
integrity of the communicative message.

Minimum Mandatory Standards - STS

ASHA believes that STS calls will require additional time before a =
CA-STS is prepared to
place the call for the following reasons:

(1) Protocols should be modified so that- the CA can be informed of =
the nature of the call
prior to placing the call. Speech perception is enhanced when the topic =
of conversation is known.=20

A CA-STS who knows that the topic is pizza and not financial investment is =
better prepared to
understand words that are not completely intelligible or are inappropriate =
and can make a more
reasonable guess at the intent of the message. Such protocols will =
require additional time before
the call can be placed to the third party.

(2) As noted above, additional time may be required to reflect back =
to the caller what was
understood and to ask questions about what was not understood. Also, the =
CA-STS may need to
ask additional questions because all information was not provided. For =
example, the CA-STS
who receives a call where the caller simply says, "Pizza," may need to ask =
questions about
toppings, delivery or carry out, type of crust etc., before placing the =
call so that communication is
more effective when the call is finally placed

(3) Presence or absence of certain technology in processing calls =
will influence speed of
answer-. For example, if common carriers provided speech recognition =
software trained to
individual caller profiles so that voice-tc-t-cur output could be provided =
to the CA-STS, speed of
answer would be increased. Use of speech clarifying software prior to =
delivery of the acoustic
signal to the CA-STS would have a similar effect.

(4) Familiarity with a caller's speech ant3 language patterns will =
increase intelligibility.=20
One only needs to consider that parents understand their child's developing=
speech and language
before grandparents and strangers to understand this concept. Relay =
centers that, as often as
possible, can use the same CA-STS each time a particular individual calls =
should find that speed
of answer is more favorable.

ASHA believes that the emphasis on minimum standards for CA-STS at =
this time should
be on conveying the intended message of the communication rather than the =
speed of answer.=20
Since STS is a new and improved service for a heterogeneous population and =
since the methods
of implementation of this service may vary widely, it is not possible to =
suggest industry standards
now

RECOMMENDATION

ASHA recommends that each CA-STS pass a practical competency =
examination for
accurately conveying the communication message at least 80% of the time. =
This examination
should represent communication samples from a broad range of speech and =
language disabilities

and include a broad range of severities. Data including speed of answer, = number of attempts by
the CA-STS to clarify the message (as a function of severity), and = consumer satisfaction
measures, should then be gathered to determine minimum standards for the = future.

Other Areas of Proposed Rulemaking

In other areas of the proposed regulation:;, ASHA supports the = inclusion of video relay
interpreting as a recoverable cost and the use of qualified interpreters = for- these services. ASHA
also believes that the FCC's proposal to allow flexibility when interactive= recorded messages are=20
encountered is a small step forward. However. ASHA's comments in response = to the proposed
regulations for Section 255 of the Telecommunications Act indicated that = such technology should
be viewed as an adjunct-to-basic service and, therefore, should require = product accessibility to
people with disabilities.

with respect to CA voice communication, effective communication is = essential to
functional equivalency. However, there is wide variation in patterns that = are clear and articulate
and can include regional, cultural, and other variations. Because of the = familiarity concept
discussed earlier, persons from the same geographical region or culture = may seem more clear and
articulate to each other than someone from a different geographic region = or culture although all
possess communication within normal limits.

The specific use of "clear and articulate" implies a standard that = exceeds effective
communication and, therefore, exceeds the essential functions (as defined = in the ADA regulations)
of the position of CA. For example, a person with a chronically hoarse = voice may be able to relay
intelligibly the message of the communication, however, it is doubtful = that such a person would be
considered to have "clear and articulate" communication.

RECOMMENDATION

Therefore, ASHA recommends that the FCC not amend its rule to require = "clear and
articulate" voice communication. A more useful standard would indicate = that a CA be able to
relay the communication to a third party at least 80% of the time without = a request for repetition.

Comment

Success of a STS service will depend upon strong and detailed = training of communication
assistants specific to this purpose and the CA's familiarity with the = broad range of communication

patterns of people with speech and language disabilities. Initial = training will need to be supplemented with ongoing education and consultation.

It may not be cost-effective to provide such a level of training for = CA-SW's at all relay centers, especially those where call volume is at the low end of the = continuum. Rather, common carriers should seriously consider national or regional centers accessible = by their own toll-free telephone numbers where CA-STS's can be concentrated and counseled on an = ongoing basis by staff with specific expertise in the full range of communication disabiliti= es. ASHA is willing to assist carriers in the development and implementation of all necessary = training.